

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DAYANA ALEXANDER.,

Plaintiff,

Vs.

**CREDIT CONTROL SERVICES, INC.,
DBA CREDIT COLLECTION SERVICES**

Defendant.

CAUSE NO.: 4:25-cv-01614

PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Dayana Alexander, appearing Pro Se, respectfully submits this Notice of Supplemental Authority in support of her Motion for Summary Judgment (Dkt. No. 8).

1. Plaintiff brings to the Court's attention the **Amicus Curiae Brief of the Consumer Financial Protection Bureau (CFPB) and the Federal Trade Commission (FTC)** filed in the case of *Roberts v. Carter-Young, Inc.*, No. 23-1911 (4th Cir. Dec. 8, 2023). A true and correct copy of the Brief is attached hereto as **Exhibit A**.
2. This authority is highly relevant to the pending Motion for Summary Judgment because it articulates the regulators' interpretation of the "reasonable investigation" standard under the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681s-2(b).
3. Specifically, the CFPB and FTC argue that a furnisher (like Defendant CCS) **cannot evade its duty to investigate** simply because a dispute involves a "legal" question or because the consumer did not provide additional documentation. This directly refutes Defendant's potential defenses regarding the scope of its investigation obligations.

4. Plaintiff requests that the Court consider this supplemental authority in ruling on the pending Motion.

Respectfully submitted by:

/s/ Dayana Alexander

Dayana Alexander, Pro Se

P.O. Box 114

Hockley, TX 77447

contact@agapeconsultations.com

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE I certify that on **November 17, 2025**, a true and correct copy of the foregoing Notice was served on all counsel of record via the Court's CM/ECF system.

Respectfully submitted by:

/s/ Dayana Alexander

Dayana Alexander, Pro Se